

ODARI ZANDAGHE WILEY )

Plaintiff, )

Pro Se )

v. )

United States Of America )

Defendant. )

4:06 CR 3145

Motion

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JUN -1 2020

CLERK  
U.S. DISTRICT COURT  
The Plaintiff uses (18 U.S.C. § 3582 (C)(1)(A)) A  
Modification Of Imposed Term Of Imprisonment  
For Particularly Extraordinary And Compelling  
Circumstances That Could Not Reasonably Have  
Been Foreseen By The Court At The Time Of  
Sentencing

(a) Mr. Wiley Has Serious Underlying Medical Conditions  
That Put Him Especially At High Risk Of Fatally Contracting  
The Coronavirus (Covid-19). Mr. Wiley Is In No Position  
To Meaningfully Limit His Exposure To Covid-19 With  
The Close Proximity And Inability To Take Mitigation  
Steps Inside The Prison.

(b) It Is Noted That Five Staff Members Have Tested  
Positive For Covid-19 Here In Beaumont. Doing Inquiry With  
Staff Members It Was Disclose To Mr. Wiley By, Warden -  
Mr. M.K. Lewis, Associate Warden - Mr. Hara, Deputy Captain -  
Mr. T. Brasfield, Unit Manager - Mr. Lacy, Case Manager -  
Mrs. Arnold, Health Service System Specialist - Clint Sonnier,

Case Manager Coordinator - Mr. Febian, That The Infected Staff Members Had Contact With Inmates Prior To And Doing The Course Of Contracting Covid-19. However, Staff Reported That None Of These Inmates Are Showing Any Symptoms As Of Now. Plaintiff Have Observed Multiple Medical Emergencies In The Pass Week By Way Of Ambulance.

(C) An Asymptomatic Carrier Of Covid-19 Can Expose Mr. Wiley To Covid-19, And With Mr. Wiley Serious Underlying Conditions Of Heart Disease Will Risk A Severe Reaction To The Coronavirus, Worse, It Risks Mr. Wiley Life.

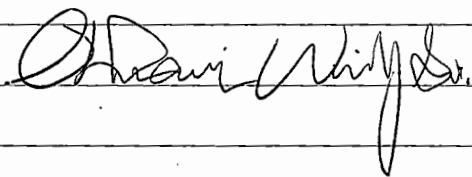
(d) Mr. Wiley Have Been Diagnose With Heart Disease With Diagnosis Of Congestive Heart Failure, Coronary Artery Disease, Severe Angina Pectoris, Microvascular Disease, Mr. Wiley Have Stents Install, Gastroesophageal Reflux Disease, Cardiomyopathy, Hyperlipidemia, Hypertension, Atherosclerotic Heart Disease, Presence Of Coronary Angioplasty Implant And Graft, High Blood Pressure, High Cholesterol, Coronary Heart Disease, Mr. Wiley Also Has An Aneurysmal In His Right Coronary Inside His Heart. Mr. Wiley Also Takes Eleven Medications Daily For His Heart Conditions. Mr. Wiley Have Been To The Hospital A Total Of Thirteen Times, Mr. Wiley Has Had Four Operations And Seven Admissions Into The Hospital. Mr. Wiley Heart Condition Is Something That Would Normally Be Seen In A Man Of 65 or 70 Rather Than His Age Of 34. Please Note, Mr. Wiley Suffered All Medical Conditions In The Pass Eighteen (18) Months.

For These Reasons Set Above, The Plaintiff Seek Relief

DATED This 24<sup>th</sup> day of May, 2020.

Respectfully,

O'Dari Z. Wiley Sr.

A handwritten signature in cursive script, appearing to read "O'Dari Z. Wiley Sr.", written in dark ink.



# 21061-047

F.C.I. Beaumont Medium

P.O. Box 26040

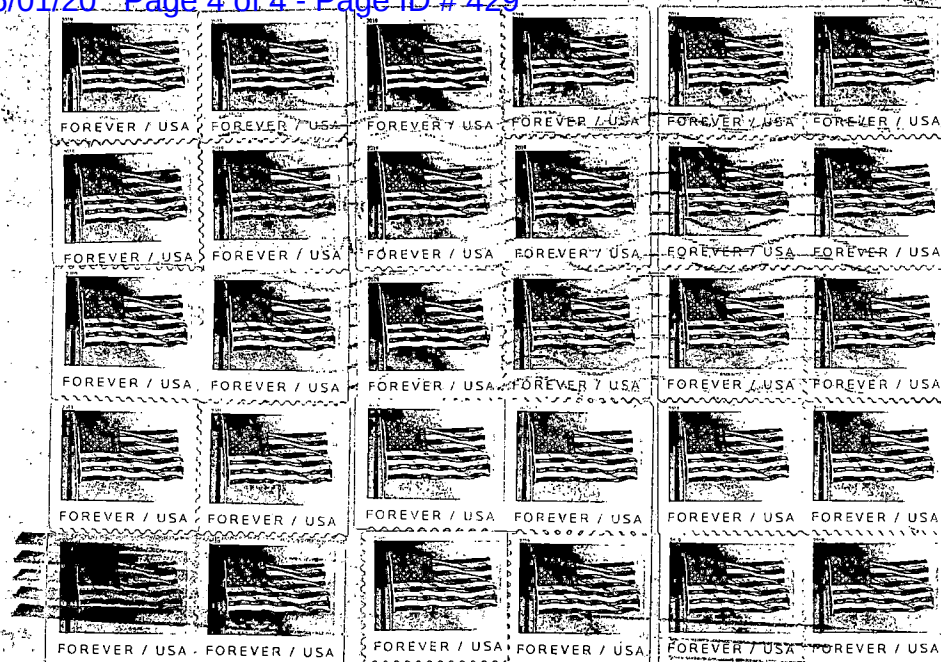
Beaumont, Tx. 77720-6040

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JUN - 1 2020

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U.S. DISTRICT COURT

Legal Mail



Office Of The Clerk

United States District Court

Roman L. Hruska U.S. Courthouse

111 S. 18<sup>th</sup> Plaza

Suite 1152

Omaha, NE. 68102-1322

